Raymond L. Bodnar, Trustee

Bodnar Trust U/A dated 12/28/2001, Respondent

17008 SW Sapri Way

Port St Lucie Florida 34986

908-752-5233

rbodnarpa@aol.com

June 28, 2021

Clerk's Office

United States District Court

Room 150 Federal Building

San Juan Puerto Rico 00918-1767

In Re; Promesa No 17 BK 3283 -LTS

Dear Sir/Madam:

Respondent hereby files the following documents in opposition to Petitioner's Motion to partially disallow and partially reclassify Respondents Proof of Claim No 6850:

- 1) Respondent's Objection to Disallowance and Reclassification of Claim No 6850
- 2) Respondent's Affidavit Supporting its Objections
- 3) Proposed Order of Denial of Motion

CC: Council for Oversight Board - Proshauer Rose LLP

Council for Creditor's Committee - Paul Hasting LLP

Certified mail Return Receipt Requested

U.S. DISTRICT SAME STATES OF THE STATE STATES OF THE STATE

Raymond L. Bodnar, Trustee for

Bodnar Trust U/A Dated 12/28/2001, Respondent

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UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF PUERTO RICO

In Re: PROMESA

THE FINANCIAL OVERSIGHT AND : Title III

MANAGEMENT BOARD FOR PUERTO RICO : No.17 BK 3283 – LTS

As representative of : Respondent's Objection to

THE COMMONWEALTH OF PUERTO RICO et: Disallowance and

Al. : Reclassification of Claim #6850

Debtors :

THREE HUNDRED FIFTY-FIFTH OMNIBUS OBJECTION OF THE COMMONWEALTH OF PUERTO RICO AND THE PUERTO RICO HIGHWAY AND TRNSPORTATION AUTHORITY FOR PETITIONER'S MOTION FOR PARTIALLY DISALLOWANCE AND RECLASIFICATION OF CLAIM NO 6850

1.Bodnar Trust U/A dated 12/28/2001, ("Respondent"), has title to \$25,000 Bond of Puerto Rico Highway and Transportation Authority 5.250% due July 1, 2034 CUSIP # 745190r67 ("HTA") held in an investment account with Charles Schwab.

- 2. Respondent did file substantial documents showing said ownership of HTA Bond as a proof of claim and such claim was designated as Claim No 6850.
- 3. Petitioner asserts that the HTA Bond of Respondent is duplicated under Master Proofs of Claim and requests an Order for partially disallowance of Claim No 6850.
- 4. Petitioner asserts that Claim No 6850 is a liability claim against Puerto Rico Electric Power Authority and requests an Order to reclassify the claim
- 5. Assertions of Petitioner either are based upon inaccurate facts and lacking any evidence as to Master Proofs of Claim, which duplicate Respondent's HTA Bond and related Claim # 6850, as refuted hereinafter.
- 6. Master Proofs of claims #37245, #38574 and #32622, submitted by Bank of New York Mellon ("BNYM") with respect to its trusteeship of certain HTA Bonds do not duplicate Respondent's Claim # 6850 relating to Respondent's HTA Bond with CUSIP # 745190R67, since BNYM denies any knowledge of Respondent's HTA Bond, as verified by the attached supporting affidavit of Raymond L. Bodnar See EXHIBIT I
- 7. Disallowance of Claim No 6850 is not supported since Petitioner does not submit any other supporting Master Proofs of Claims with specific claim numbers

or the name of the organizations submitting such Master Proofs of Claim, which allegedly duplicate the Respondent's HTA Bond in order for Respondent to verify the accuracy of Petitioner's allegation of duplication, as verified by supporting Affidavit of Raymond L. Bodnar – see Exhibit I.

8. Reclassification of Respondent's HTA Bond and Proof of Claim #6850 as a liability residing with the Puerto Rico Electric Power Authority is based upon inaccurate facts, submitted by Petitioner to this Court. Respondent's Proof of Claim #6850 relates solely to its \$25,000 Bond of Puerto Rico Highway and Transportation Bond 5.25% due July 1, 2034 CUSIP # 745190R67. Respondent's Proof of Claim # 6737 relates solely to its \$25,000 bond of Puerto Rico Electric Power Authority Bond 5% due 7/1/23 CUSIP # 7452QCL4. The foregoing separate Proofs of Claim for different Bonds is verified in the attached supporting Affidavit of Raymond L. Bodnar – see Exhibit I.

WHEREFORE the Respondent hereby demands that the Petitioner's motion to disallow or reclassify Claim No 6870 be denied based upon Petitioner's failure to present accurate facts and Petitioner's failure to submit verifiable evidence as to any Master Proofs of Claim with specific claim numbers and name of submitting organization, which allegedly duplicate Respondent's

HTA Bond.

Dated: 6/202/

Bodnar Trust U/M dated 12/28/2001

Raymond L. Bodnar

Certification of Raymond L. Bodnar

Raymond L. Bodnar hereby certifies and affirms that the foregoing information is true. I am aware that if such information is willfully false, I am subject to punishment.

Dated: 6/2021

Raymond L. Bodnar

Certification of Service

I, Raymond L. Bodnar hereby certify and affirm that these pleadings were served upon (a) Clerk's Office US District Court for District of Puerto Rico, (b) Council for Oversight Board – Proshauer Rose LLP and (c) Counsel for Creditor's Committee Paul Hasting LLP by certified mail, return receipt requested on June 28, 2021 with ample postage for delivery to the foregoing.

Dared

6/21/2021

Raymond L. Bodnar